



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALK
F. #2020R00275

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 16, 2022

By ECF

The Honorable Ann M. Donnelly
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Donnell Russell
Criminal Docket No. 20-427 (AMD)

Dear Judge Donnelly:

The government respectfully submits this supplemental letter in connection with the sentencing of the defendant Donnell Russell scheduled for November 17, 2022 at 11:00 a.m. After the government filed its sentencing submission, see ECF No. 31, the government discovered that, on July 27, 2022, the day after the defendant pleaded guilty in this case, the defendant gave a YouTube interview titled “Donnell Russell talks about the New York Trials & Why He Took A Plea Deal.” During the interview, the defendant discusses this case as well as his criminal case in the Southern District of New York. As to this case, the defendant repeatedly minimizes his offense conduct and demonstrates an utter lack of remorse for harassing and threatening Jane Doe and for publicly posting sexually explicit photographs of Jane Doe to Facebook. For example, the defendant refers to Jane Doe and her mother as “questionable” and boasts about threatening Jane Doe and her mother. See Ex. C at 1:27–2:47. The full interview is available on YouTube at the following link: <https://www.youtube.com/watch?v=W31fKNPJUdg>. The government attaches three particularly probative clips hereto as Exhibits A, B and C.

In addition, the government noted in its sentencing submission that one of the YouTube interviews described in the submission, see ECF No. 31 at 4, remained available on the Internet, see id. at 5. The government has since attempted to view the interview on

YouTube and it appears the interview is no longer available on the YouTube page of the original poster.

Respectfully submitted,

BREON PEACE
United States Attorney

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cc: Clerk of the Court (AMD) (by ECF)
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